

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CLOUDING IP, LLC,

Plaintiff,

v.

SAP AG AND SAP AMERICA, INC.,

Defendants.

C.A. No. 13-1456-LPS

**PLAINTIFF CLOUDING IP, LLC’S OPPOSITION TO  
DEFENDANTS’ MOTION TO DISMISS FOR LACK OF STANDING**

Defendants SAP AG and SAP America, Inc., (“Defendants”) have joined with defendants in the related cases *Clouding IP, LLC v. Google Inc.*, C.A. No. 12-639-LPS, *Clouding IP, LLC v. Motorola Mobility LLC*, C.A. No. 12-1078-LPS, *Clouding IP, LLC v. Amazon.com, Inc. et al.*, C.A. No. 12-0641-LPS, *Clouding IP, LLC v. EMC Corporation et al.*, C.A. No. 13-01455-LPS and *Clouding IP, LLC v. Rackspace Hosting Inc. et al.*, C.A. No. 12-675-LPS to Bifurcate Damages from Liability and to Stay Damages-Related Fact and Expert Discovery.

The facts surrounding Clouding IP’s LLC’s ownership and standing to assert its patent rights are the same in this case as in *Amazon*, *Google*, *Motorola*, *Rackspace*, and *EMC*. For the convenience of the Court and to reduce burden on the Court, Clouding IP, LLC incorporates by reference the briefs in opposition to each of the motions to dismiss for lack of standing. (C.A. No. 12-639-LPS at D.I. 120, C.A. No. 12-1078-LPS at D.I. No. 109, C.A. No. 12-0641-LPS at D.I. 129, C.A. No. 12-675-LPS at D.I. 171, and C.A. No. 1455-LPS at D.I. No. 39.)

January 6, 2014

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